

Region 6 Debris Disposal Burning Policy

What types of burning qualify as a debris disposal burn?

Fire may be used to dispose of wildland fuels generated from maintenance activities (such as grass or brush mowing or clippings), hazard tree removal, or during construction activities. These materials must be deemed infeasible or impractical to mechanically remove and must be in a non-wildland fuel environment (parking lot, bone yard, gravel pit, etc.) Where permitted specifically by local regulations, discarded building and administrative materials can also be burned. All such activities and all new debris burning projects will be reviewed by the District Fire Management Officer.

If, after consultation with the Fire Management Officer, it is determined that a debris disposal burn will meet all of the following conditions then it may be conducted within debris disposal guidelines:

1. Has virtually no chance to exceed the perimeter of the non-wildland environment.
2. Will not damage surrounding natural or cultural resources.
3. Does not present a safety threat to crew members.
4. Will not require curtailment during the burning operation.
5. Will not require a prescribed fire burn boss or fire-qualified personnel to implement.
6. Requires no follow-up monitoring to evaluate environmental impacts. Otherwise, it will constitute a prescribed fire and must comply with all requirements for that type of activity.

All debris disposal projects must be evaluated in terms of alternative treatments. Alternative treatments to burning may be possible, and desirable in terms of smoke management and visibility concerns. No burn plan will be required for these burns although other types of plans may be required as listed below.

What procedures should be followed for debris disposal burns?

For debris burns, the crew should include someone who has previously conducted a similar burn at the site or a similar site. All personnel will wear appropriate personal protective equipment. Other hazards such as nails and wire in debris or lifting heavy materials often become more important than typical fireline safety concerns.

The supervisor of the burn will be responsible for:

- Adhering to FWS policy regarding the disposal of hazardous materials
- Obtaining all needed permits and clearances
- Notifying appropriate agencies (air quality, local fire departments, etc.) and neighbors
- Developing appropriate Job Hazard Analyses and briefings
- Developing appropriate safety and evacuation plan in case of injuries or other emergencies.

How should disposal of debris generated as part of contracted projects be treated?

Contracts involving the generation or disposal of such fuels should be developed and conducted in coordination and consultation with the District Fire Management Officer. All construction contracts/projects producing vegetative debris should specify when and how the material would be disposed. If fire is a potential disposal method, the District Fire Management Officer should review and approve contract stipulations related to debris burning. Costs associated with the debris burning should be included in the contract/project budget.

Are there circumstances in which debris disposal burns will still need a written burn plan?

If a debris disposal burn does not meet the conditions listed above, then the standard prescribed burn format will be used. This format will lead the planner through the steps (e.g., did you get a weather forecast to know the wind would come up in three days? Did you clear out an area around the pile as part of your prep work? Did you make provisions for mopping up the pile or checking it daily until it is declared out, and so forth)? Many of the parts of the prescribed burn plan format will not be needed or will not apply and can simply be completed as "N/A". Mitigating factors, such as "The burn will not be conducted unless there is an inch of snow on the ground", should make this a pretty simple process. Standard fuel models will probably not apply and do not need to be included. Instead, simple descriptions of the materials to be burned and how the burn will be conducted are all that is needed.

If non-wildland fuel debris disposal activities will take place on a regular basis it is recommended that an appendix to the station's fire management plan be developed so the burn planning doesn't have to be addressed every time. This appendix could include the activity, conditions that must be met whenever you conduct burns in this manner, and any necessary mitigations. For example, some refuges might have a burn pit or bone yard area that is regularly used to dispose of debris during the winter when there is snow on the ground.

Is a burn plan needed to dispose of empty Service-owned houses?

The District Fire Management Officer should be consulted whenever burning is being considered as a means of disposing of a structure. Cultural clearances, proper property disposal notifications, and the potential for hazardous materials are special concerns in these situations. The manager of the station where the house is being disposed of is responsible for ensuring that all Fish and Wildlife regulations are followed.

The situation and proposed mitigations should be carefully weighed to determine whether they will prevent virtually any possibility of the fire spreading to wildland vegetation. The standard FWS burn plan format is recommended to make sure that all planning aspects have been considered but is not required. A burn boss is not required as long as

the conditions listed above are met. If there is a possibility that the fire may spread to the adjacent wildland vegetation, then a written burn plan and appropriate burn boss are required.

A written agreement must be made with local fire departments to dispose of old structures. A special use permit is suggested as the simplest instrument but a MOU could also be used. The document should stipulate that the fire department has the responsibility for planning/executing the burn and ensuring that the fire does not spread to anything nearby. A prescribed fire burn plan is not required by the Fish and Wildlife Service, but other planning documents may be advisable depending on the complexity of the situation. It is important that both the Service and the department clearly understand who is responsible for which activity, especially for things like final mop-up of the remains.

Is any reporting necessary for debris disposal burns?

In an effort to clarify what is reportable as a prescribed fire in the Fire Management Information System (FMIS) or as a type 48, prescribed fire, on the old DI-1202, the following guidance is offered:

1. If burning of debris does NOT require preparation of a prescribed fire plan that meets guidance given in this document, the burn should NOT be reported as a prescribed fire.
2. Maintenance clears a roadside of brush. The resulting debris is hauled to a "bone yard" where it is burned in compliance with state air quality regulations. No resource objectives are met and no prescribed fire plan is done. No fire report is required.
3. A series of ditch banks which could spread to other wildland fuels are burned. The burn is conducted according to a prescribed fire plan. Complete a fire report.
4. Debris resulting from a construction project is burned according to a contract. The burning of construction debris is prohibited under many state air quality regulations. No fire report is required, unless a prescribed fire plan is prepared stating resource objectives.
5. A number of piles are burned according to a prescribed fire plan. Complete a fire report. In this instance the total area cut and piled is the treated area, and not just the area occupied by the piles. For example, if a 10 acre hazard fuel area is treated (thinning and/or clearing) and resultant two (2) acres of piled debris is burned, the reportable treated acres would be 10 acres.
6. An empty house is burned by Service personnel according to a prescribed fire plan. Complete a fire report.
7. An empty house is burned by a local volunteer fire department as a training exercise. No resource objectives are met and no prescribed fire plan is done. No fire report is required.